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May 26, 2023

**By ECF**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,  
No. 20 Civ. 8924 (CM) (GWG)  
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and one of the attorneys assigned to the defense of the above-referenced matter. We write to respectfully request that the Court permit Defendants to submit an opposition to Plaintiffs' requests for sanctions, costs and an order compelling the deposition of Deputy Chief Michael Baker (Docket No. 1013) on or before Thursday, June 1, 2023. Plaintiffs' requests are new, and present issues Defendants have not yet had the opportunity to address in their application on May 23, 2023 (Docket No. 1007). An extension for Defendants to provide an opposition is necessary as the undersigned is the attorney assigned to this discovery dispute and has a full schedule of deposition preparation and depositions on May 26, 30, and 31. This is Defendants' first request for an extension to file an opposition to Plaintiffs' request.

Thank you for your time and attention to this matter.

Respectfully submitted,

*Peter Scutero* sl  
Peter Scutero  
Special Associate Counsel  
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF)